UNITED STATES DISTRICT COURT



NORTHERN DISTRICT OF CALIFORNIA

HRI

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

VS.

CHRISTIAN REIMER STUKENBROCK,

a/k/a Reimar Stuckenbrock, a/k/a Reymar Stukenbrock, a/k/a Reimar Christian Heinrich Julius Stuckenbrock, a/k/a Christian Stukenbrock

INDICTMENT

Counts One - Nine:

18 U.S.C. § 1343 - Wire Fraud

A true bill.

Foreperson

Filed in open court this A.D. 201

day of Janvon

United States Magistrate Judge

Bail. \$ No bail arest warmst



	Case 5:15-cr-00034-EJD Docum	ent 1 Filed 01/14/15 Page 2 of 7		
1 2	MELINDA HAAG (CABN 132612) United States Attorney	SEALED BY ORDER E-filing		
3		for it is		
4		JAN GO		
5		NORTHERN US. DW. MUST		
6		SAN CO CO		
7		OSE CALIFORNIA		
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN JOSE DIVISION			
11				
12	UNITED STATES OF AMERICA,	carro. 15 00034		
13	Plaintiff,	VIOLATIONS: 18 U.S.C. § 1343 – Wire Fraud; 18		
14	v.) U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)) Forfeiture		
15	CHRISTIAN REIMER STUKENBROCK, a/k/a Reimar Stuckenbrock,))		
16 17	a/k/a Reymar Stukenbrock, a/k/a Reimar Christian Heinrich Julius Stuckenbrock,)))		
18	a/k/a Christian Stukenbrock))		
19	Defendant.) SAN JOSE VENUE)		
20				
21	<u>INDICTMENT</u>			
22	The Grand Jury charges that, at all relevant times:			
23	CHRISTIAN REIMER STUKENBROCK was a resident of Los Altos Hills, California,			
24	and held himself out to be the Managing Director and President of Silicon Valley Technology Group.			
25	2. Silicon Valley Technology Group (SVTG) was an entity originally founded in 2000 by			
26	STUKENBROCK, and another individual who resigned in 2002. STUKENBROCK represented SVTG			
27	to be a venture capital firm focusing on Silicon Valley start-up companies.			
28				
	INDICTMENT			

- 3. The FEDWIRE system is an electronic funds transfer and book-entry securities transfer service that links twelve Federal Reserve Banks with approximately 10,000 depository institutions nationwide. Every funds transfer sent through FEDWIRE automatically triggers an electronic wire communication to the Funds Transfer Host Application located in East Rutherford, New Jersey, for registration before being transferred to its final destination. As such, all wires alleged in this indictment that used FEDWIRE, were in interstate and foreign commerce.
- 4. The Clearing House Interbank Payments System (CHIPS) is the nation's main electronic funds transfer system for processing international United States dollar funds transfers made between international banks. CHIPS participants are required to have a banking office in the United States. All wires alleged in this indictment that used CHIPS were in interstate and foreign commerce.

The Scheme to Defraud

- 5. Beginning in 2007 and continuing through at least 2012, STUKENBROCK engaged in a scheme and artifice to defraud at least one investor, "GF," and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises by promising to invest money in specified companies on behalf of GF and instead diverting a large share of the investment monies to himself.
- 6. Between 2007 and 2011, GF provided STUKENBROCK, through STUKENBROCK's company SVTG, with almost \$22 million for the purpose of investing that money in identified partner companies. STUKENBROCK promised to invest all the money in the partner companies, save for at most 5% of the investment funds, which he represented would be used for the operating expenses of SVTG.
- 7. In fact, STUKENBROCK invested a net amount of only about \$11.2 million of GF's approximate \$22 million in the specified companies. He diverted approximately \$8.5 of the investment funds to his own use.
- 8. Prior to making an investment, GF would execute a Stock Purchase Agreement (SPA) with STUKENBROCK, in which GF would purchase shares of SVTG. STUKENBROCK represented that in exchange for GF's purchase of SVTG stock, SVTG would invest the agreed-upon amount in the partner company named in the SPA.

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the defendant.

- 9. As part of his scheme, STUKENBROCK solicited almost \$22 million from GF for investments in at least seven companies, including: Albutec, GmBH, a German Company which produced blood purification machines; Protech Services, Inc., a company developing agricultural waste water treatment technology; Solar Power Partners, an independent solar power producer and distributer; Ticket Out Film Partners, a limited liability company developing a motion picture regarding domestic abuse; Ready Solar, a company providing residential solar technology; Shadow Mountain, a company providing construction management services; and Clean Mobile AG, a German company that produced and developed customer-specific drive systems and components for pedelecs, e-Bikes, and electric cargo vehicles.
- 10. STUKENBROCK invested a net amount of only about \$11.2 million of GF's money in these seven companies. Rather than invest the money as promised, he used approximately \$8.5 million for his own personal benefit, including: to pay for his housing; to support his own businesses, including True Exotic, a company that rented out high-end cars; and for other uses not related to the business of SVTG or the seven partner companies.

COUNTS ONE THROUGH NINE:

(18 U.S.C. § 1343 – Wire Fraud)

12. On or about the dates set forth below, in the Northern District of California and elsewhere,

11. Paragraphs 1 through 10 are realleged and incorporated as if fully set forth here.

CHRISTIAN REIMER STUKENBROCK,

for the purpose of executing a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce certain writings, signs, signals, and pictures, specifically electronic funds transfers, from GF to bank accounts held for the benefit of SVTG and from SVTG to accounts controlled by STUKENBROCK, as indicated below:

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COUNT	DATE	ITEM	WIRED FROM	WIRED TO
		WIRED	·	
1	02/26/2010	\$22,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Union Bank in California
2	3/11/2010	\$280,000	GF's account at China Trust in Hong Kong (via CHIPS for Ticket Out)	SVTG's account at UBS in New York
3	05/07/2010	\$250,000	GF's account at China Trust in Hong Kong (via CHIPS for ProTech)	SVTG's account at UBS in New York
4	10/12/2010	\$235,482.50	GF's account at China Trust in Hong Kong (via CHIPS for Ticket Out)	SVTG's bank account at UBS in New York
5	10/12/2010	\$15,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Union Bank in California
6	10/26/2010	\$50,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California
7	1/14/2011	\$35,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California
8	02/08/2011	\$150,250	GF's account at China Trust in Hong Kong (via CHIPS for Solar Power Partners)	SVTG's account at UBS in New York
9	06/06/2011	\$36,500	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

- 13. Paragraphs 1 through 10, and the transactions alleged in each of Counts One through Nine, are realleged as if fully set forth here.
 - 14. Upon a conviction of any of the offenses alleged in Counts One through Nine, the defendant, CHRISTIAN REIMER STUKENBROCK,

shall forfeit to the United States all property constituting and derived from proceeds traceable to violations of Title 18, United States Code, Section 1343 (Wire Fraud), as alleged in Counts One through Nine of this Indictment.

1	15. If any of the forfeitable property, as a result of any act or omission of the defendant:			
2	a) cannot be located upon the exercise of due diligence;b) has been transferred or sold to or deposited with a third person;			
3	c) has been placed beyond the jurisdiction of the Court; d) has been substantially diminished in value; or			
4	e) has been commingled with other property which cannot be divided without difficulty;			
5	the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States			
6	Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).			
7	All in violation of Title 18, United States Code, Section 1343 (Wire Fraud), Title 18, United			
8	States Code, Section 981 (a)(1)(C) and Title 28, United States Code, Section 2461(c).			
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10	DATED: A TRUE BILL.			
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12	FOREPERSON			
13	MELINDA HAAG			
14	United States Attorney			
15 d	\mathcal{H}_{α}			
16	JEFFREY D. NEDROW			
17	Chief, San Jose Branch			
18	(Amaround on to form)			
19	(Approved as to form: AUSA ROSEN			
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AO 257 (Rev. 6/78)

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT				
BY: COMPLAINT INFORMATION INDICTMENT	Name of District Court, and/or Judge/Magistrate Location			
OFFENSE CHARGED SUPERSEDIN	NORTHERN DISTRICT OF CALIFORNIA			
18 U.S.C. § 1343 - Wire Fraud Petty	SAN JOSE DIVISION			
Minor	C DEFENDANT - U.S			
± Misde	-			
□ mean	7			
PENALTY: 20 years imprisonment	DISTRICT COURT NUMBER			
\$250,000 fine or twice the gross gain or loss from the offense 3 years supervised release \$100 special assessment fee	CR 15 NORTHER 0-0 0034			
	DEFENDANT OF COURS			
PROCEEDING	IS NOT IN CUSTODY			
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding. 1) X If not detained give date any prior			
FBI	summons was served on above charges			
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive			
give name or court	3) Is on Bail or Release from (show District)			
this person/proceeding is transferred from another district				
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTORY			
	IS IN CUSTODY 4) On this charge			
this is a reprosecution of	4) Circuit straige			
charges previously dismissed which were dismissed on motion SHOW	5) On another conviction			
of: DOCKET NO.	6) Awaiting trial on other charges			
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution			
this prosecution relates to a	Has detainer Yes 1 If "Yes"			
pending case involving this same defendant MAGISTRATE	give date			
prior proceedings or appearance(s) CASE NO.	DATE OF Month/Day/Year			
before U.S. Magistrate regarding this	ARREST			
defendant were recorded under	Or if Arresting Agency & Warrant were not			
Name and Office of Person Furnishing Information on this form MELINDA HAAG	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY			
☑ U.S. Attorney ☐ Other U.S. Agency				
Name of Assistant U.S. Attorney (if assigned) AUSA Amber Rosen	This report amends AO 257 previously submitted			
ADDITIONAL INF	ORMATION OR COMMENTS			
PROCESS:	Boil Amount: Nove			
SUMMONS NO PROCESS* WARRANT If Summons, complete following:	Bail Amount: None			
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment			
Defendant Address:				
	Date/Time: Before Judge:			
Comments:				